

Laura Vartain Horn (SBN 258485)  
**KIRKLAND & ELLIS LLP**  
555 California Street, Suite 2700  
San Francisco, CA 94104  
Telephone: (415) 439-1625  
laura.vartain@kirkland.com

Jessica Davidson (Admitted *Pro Hac Vice*)  
Christopher D. Cox (Admitted *Pro Hac Vice*)  
**KIRKLAND & ELLIS LLP**  
601 Lexington Avenue  
New York, NY 10022  
Telephone: (212) 446-4800  
jessica.davidson@kirkland.com  
christopher.cox@kirkland.com

Allison M. Brown (Admitted *Pro Hac Vice*)  
**KIRKLAND & ELLIS LLP**  
2005 Market Street, Suite 1000  
Philadelphia, PA 19103  
Telephone: (215) 268-5000  
alli.brown@kirkland.com

*Counsel for Defendants*  
UBER TECHNOLOGIES, INC.,  
RASIER, LLC, and RASIER-CA, LLC

*[Additional Counsel Listed on Signature Pages]*

**UNITED STATES DISTRICT COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**  
**SAN FRANCISCO DIVISION**

IN RE: UBER TECHNOLOGIES, INC.,  
PASSENGER SEXUAL ASSAULT  
LITIGATION,

Case No. 3:23-md-03084-CRB

**STIPULATION AND ORDER  
REGARDING PRODUCTION OF  
DOCUMENTS IN ADVANCE OF WAVE  
1 BELLWETHER DEPOSITIONS**

This Document Relates to:

All Wave 1 Bellwether Cases

Judge: Hon. Lisa J. Cisneros  
Courtroom: Courtroom G – 15th Floor

**RECITALS**

**WHEREAS**, the parties are interested in facilitating the prompt and efficient completion of Wave 1 bellwether depositions;

**WHEREAS**, in a joint status report submitted on July 21, 2025 and during the hearing held before the Court on July 25, 2025, the parties presented their respective positions regarding production of documents relating to such depositions a reasonable time before such depositions take place;

**WHEREAS**, during the hearing held before the Court on July 25, 2025, the Court expressed its view regarding what would constitute a reasonable period of time for production prior to such depositions;

**WHEREAS**, the parties acknowledge that there are existing requests for documents and information relating to Wave 1 bellwether depositions, which have been the subject of meet-and-confer discussions;

**STIPULATION**

**NOW, THEREFORE**, the parties hereby agree and request the Court enter the parties' stipulation as follows:

1. The party tendering the witness will produce at least three business days prior to any scheduled Wave 1 bellwether deposition documents relating to the deposition that have been requested by the deposing party, subject to meet-and-confer discussions.
2. If there is a dispute about the nature or extent of such production, the parties shall raise the dispute with the Court by joint letter no later than two business days prior to the scheduled Wave 1 bellwether deposition.

**IT IS SO STIPULATED.**

1 Dated: July 30, 2025

Respectfully submitted,

2 By: /s/ Laura Vartain Horn  
3 Laura Vartain Horn (SBN 258485)  
4 **KIRKLAND & ELLIS LLP**  
5 555 California Street, Suite 2700  
6 San Francisco, CA 94104  
7 Telephone: (415) 439-1625  
8 laura.vartain@kirkland.com

9 Jessica Davidson (Admitted *Pro Hac Vice*)  
10 Christopher D. Cox (Admitted *Pro Hac Vice*)  
11 **KIRKLAND & ELLIS LLP**  
12 601 Lexington Avenue  
13 New York, NY 10022  
14 Telephone: (212) 446-4800  
15 jessica.davidson@kirkland.com  
16 christopher.cox@kirkland.com

17 Allison M. Brown (Admitted *Pro Hac Vice*)  
18 **KIRKLAND & ELLIS LLP**  
19 2005 Market Street, Suite 1000  
20 Philadelphia, PA 19103  
21 Telephone: (215) 268-5000  
22 alli.brown@kirkland.com

23 *Counsel for Defendants*  
24 UBER TECHNOLOGIES, INC.,  
25 RASIER, LLC, and RASIER-CA, LLC

26 Dated: July 30, 2025

Respectfully submitted,

27 By: /s/ Roopal P. Luhana  
28 Roopal P. Luhana  
**CHAFFIN LUHANA LLP**  
600 Third Avenue, Floor 12  
New York, NY 10016  
Telephone: (888) 480-1123  
luhana@chaffinluhana.com

Sarah R. London  
**GIRARD SHARP LLP**  
601 California St., Suite 1400  
San Francisco, CA 94108  
Telephone: (415) 981-4800  
slondon@girardsharp.com

Rachel B. Abrams (SBN 209316)  
**PEIFFER WOLF CARR KANE**

CONWAY & WISE, LLP  
555 Montgomery Street, Suite 820  
San Francisco, CA 94111  
Telephone: (415) 426-5641  
rabrams@peifferwolf.com

*Co-Lead Counsel for Plaintiffs*

**ATTESTATION**

Under Civil Local Rule 5-1(h)(3), I attest that all signatories listed, and on whose behalf the filing is submitted, concur in the filing's content and have authorized the filing.

Dated: July 30, 2025

By: /s/ Laura Vartain Horn

**ORDER**

PURSUANT TO STIPULATION, IT IS SO ORDERED.

DATED: July 31, 2025

  
\_\_\_\_\_  
HON. LISA J. CISNEROS  
United States Magistrate Judge